



December 3, 2013

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**BY FACSIMILE [1.856.757.5076] AND
BY FIRST CLASS MAIL**

Robert B. Kugler
United States District Judge
Room 6040
P.O. Box 889
Mitchell H. Cohen United States Courthouse
1 John F Gerry Plaza
Camden, NJ 08101

Re: LaPorte v. Premier Education Group
Case No: 11-CV-03523-RBK-AMD
File No: 11155.00029

Dear Judge Kugler:

This firm is local counsel for defendants Premier Education Group, L.P. and Premier Education Group, G.P., Inc., in the above-referenced matter. This is an alleged federal and multiple states' false claims act case brought by seven plaintiffs/relators. The Complaint – which is actually the unsealed Third Amended Complaint - consists of approximately four hundred and fifty-five (455) paragraphs, and twelve causes of action under federal and state law, set forth in more than one hundred and fifty (150) pages of pleading.

Defendants' response to the Complaint is due January 21, 2014. Defendants are in the process of preparing a Motion to Dismiss some or all of the Complaint. Pursuant to instructions from chambers as to the Court's preferred method of addressing this request, kindly

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accept this letter in lieu of a more formal application in which defendants seek permission from your Honor to expand the forty (40) page limit of L. Civ. 7.2(b) by fifteen (15) pages. This would allow defendants to submit a fifty-five (55) page motion brief in support of their Motion To Dismiss.

Defendants respectfully submit that the requested page expansion is necessary due to the significant number of causes of action and nature of the claims set forth in the Complaint.

Briefly, the seven plaintiffs/relators have filed a massive Complaint against the defendants. The sheer size of the pleading is illustrated by the fact that the Complaint has its own Table of Contents (copy enclosed).

Moreover, the plaintiffs/relators have asserted a large variety of claims under multiple and varying sections of the federal False Claims Act, 31 U.S.C. §372, as well as under the False Claims Acts of Delaware, Massachusetts, New Jersey and New York, as well as common law intentional infliction of emotional distress claims.

In order for defendants properly to present a cogent analysis of the facts alleged in the Complaint, as well as to address the many federal and state laws at issue, defendants' requested expansion, respectfully, is necessary.

The Court's consideration of defendants' request is appreciated.

Respectfully submitted,

Wilson Elser Moskowitz Edelman & Dicker LLP

A handwritten signature in black ink, appearing to read "Kevin C. Donovan".

Kevin C. Donovan

KCD/bl
Enclosure

cc: David J. Sinderbrand, Esq. (w/encl.) | BY ELECTRONIC MAIL;
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA *ex rel.*) Civil Action No. 1:11-CV-03523-rbk
LAURA LAPORTE, ANGELA)
DAVENPORT, PAMELA HONE, ROBERT) **FILED UNDER SEAL**
BIASELLI, KELLI J. AMAYA,)
AMANDA KENNY, and DORIS MOODY,)
and on behalf of the STATES of)
DELAWARE, NEW JERSEY, NEW)
NEW YORK and the COMMONWEALTH)
OF MASSACHUSETTS,) **THIRD AMENDED COMPLAINT**
 Plaintiffs,) **FALSE CLAIMS ACT VIOLATIONS**
 v.) **UNDER 31 U.S.C. § 3729 ET SEQ.**
) **FILED BY HAND**
PREMIER EDUCATION GROUP, I., P. and) **JURY TRIAL DEMANDED**
PREMIER EDUCATION GROUP,)
G.P., INC. d/b/a HARRIS SCHOOL)
OF BUSINESS, BRANFORD HALL)
CAREER INSTITUTE, SALTER)
COLLEGE, THE SALTER SCHOOL,)
SEACOAST CAREER SCHOOLS,)
SUBURBAN TECHNICAL SCHOOL,)
SALTER SCHOOL OF NURSING)
& ALLIED HEALTH; and JOHN DOES)
NOS. 1-50, FICTITIOUS NAMES,)
 Defendants.)

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